

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**LITTLE GIANT LADDER
SYSTEMS, LLC**, a Utah company,

Plaintiff,

vs.

TRICAM INDUSTRIES, INC., a
Minnesota corporation,

Defendant.

Case No. 0:20-cv-02497-KMM-ECW

**JOINT MOTION TO AMEND
EXPERT DEADLINES IN
SCHEDULING ORDER**

Plaintiff Little Giant Ladder Systems, LLC (“Plaintiff”) and Defendant Tricam Industries, Inc. (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly move the Court to amend certain expert-related deadlines currently set by the Second Amended Scheduling Order (Dkt. 115).

On September 23, 2022, the Court entered its Order (Dkt. 120) on Plaintiff’s Motion to Compel which triggered certain deadlines set forth in Second Amended Scheduling Order (Dkt. 115). The Parties conferred on September 29, 2022 and Defendant’s counsel informed Plaintiff’s counsel of significant scheduling conflicts of its damages expert based on when the response report deadline fell. The Parties agreed to extend the expert report deadlines by approximately 14 days to accommodate Defendant’s conflicts while ensuring the subsequent summary judgment and trial ready deadlines remained unchanged.

Accordingly, the Parties believe good cause exists to amend the scheduling order and jointly move the Court to modify the Second Amended Scheduling Order (Dkt. 115) as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Party with burden of proof must disclose initial expert report	October 7, 2022	October 21, 2022
Opposing Party (without burden of proof) must disclose response expert report	November 7, 2022	November 21, 2022
Party with burden of proof must disclose rebuttal expert report	November 22, 2022	December 9, 2022
Expert discovery cutoff	January 6, 2023	January 23, 2023
Non-dispositive motions regarding expert discovery	January 23, 2023	February 3, 2023
Deadline to file summary judgment motion	February 3, 2023	<i>No change</i>
Deadline to file summary judgment opposition brief	March 3, 2023	<i>No change</i>
Deadline to file summary judgment reply brief	March 17, 2023	<i>No change</i>
Summary judgment hearing	TBD	<i>No change</i>
Trial ready	60 days after the Court issues its Summary Judgment Order	<i>No change</i>

A proposed order is attached for the Court's convenience.

Dated: September 30, 2022

By: /s/ Mark A. Miller

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